

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Eugene Westmoreland,)	
)	
Plaintiff,)	No.: 23-cv-1851
)	
v.)	
)	Hon. Jeffrey T. Gilbert
Cook County Sheriff Thomas Dart, et al.)	
)	
Defendants.)	
)	

**DEFENDANTS' AGREED MOTION FOR EXTENSION OF TIME
FOR BRIEFING OF DISPOSITIVE MOTIONS**

NOW COME Defendants COOK COUNTY SHERIFF THOMAS DART, and COOK COUNTY, a body politic and corporate, by and through their attorneys, Jason E. DeVore and Zachary G. Stillman, of DeVore Radunsky LLC, pursuant to Fed. R. Civ. P. 6(b), and for Defendants' Agreed Motion for Extension of Time for Briefing of Dispositive Motions, state as follows:

1. Counsels for all parties have been in communication regarding this Motion and are in agreement as to the requested extension.
2. On August 13, 2024, this Court issued an order setting the following agreed Dispositive Motion Schedule: Motions due by October 15, 2024; Responses due by November 15, 2024, and Replies due by December 6, 2024. (ECF No. 92.)
3. Both Plaintiff and Defendants have now agreed that they need additional time to draft any dispositive motions at present because of their schedules, including as a result of a planned complex and lengthy trial beginning in early November to be handled by Defendants' Counsels.

4. Additional time is also preferred to give the Court time to potentially rule on Plaintiff's Motions for Class Certification, and for Permanent Injunctive Relief.
5. Accordingly, the parties now request a 48 (forty-eight) day extension to all deadlines, up to and including the following dates: Motions due by December 2, 2024; Responses due by January 10, 2025; and Replies due by January 23, 2025.
6. Under Rule 6(b), this Court may, for good cause, extend the time “[w]hen an act may or must be done.” Fed. R. Civ. P. 6(b).
7. Not granting the requested extensions of time would prejudice the parties because the current deadlines will not allow sufficient time to properly prepare and submit their briefs.
8. The extension will grant the parties sufficient time to prepare their briefs, as well as allow the Court more time to potentially rule on the aforementioned pending Motions, the results of which could strongly impact both parties' arguments at this dispositive stage.
9. Granting an extension of time will not prejudice any party and this motion is not brought for undue delay or any improper purpose.

WHEREFORE, Defendants respectfully request that this Honorable Court enter an order as

follows:

1. The Agreed Motion for Extension of Time is granted;
2. Dispositive Motions are due by December 2, 2024; Responses due by January 10, 2025; and Replies due by January 23, 2025; and
3. Any other such relief as this court deems reasonable and just.

Respectfully Submitted,

Defendants

By: /s/ Zachary G. Stillman
Zachary G. Stillman, One of the
Attorneys for Defendants

DEVORE RADUNSKY LLC

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CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that the Agreed Motion for Extension of Time was filed on October 9, 2024, with the Northern District of Illinois ECF System, serving a copy to all parties.

/s/Zachary Stillman
Zachary Stillman